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ABSTRACT

This document provides information for postsecondary institutions to allow them to review and correct errors in the federal student loan program cohort default rate data that the guaranty agencies provide to the U.S. Department of Education prior to the final calculation of official cohort default rates. Data are provided to schools through a new database, the National Student Loan Data System, which contains loan-level information on the Title IV aid programs. The first section of this guide presents consequences to institutions of cohort default rates from less than 20 percent to greater than 40 percent. The second section describes the procedures used to calculate the cohort default rate including instructions on how to use this information to calculate an individual school's fiscal year 1993 cohort default rate. The third section gives directions on challenging the data prior to the calculation of official cohort default rates such as reviewing the back-up data and presenting the guaranty agency with a checklist identifying disputed accounts and providing evidence to support allegations of error. Also provided are the list of loan status codes, names and addresses of the guaranty agencies by state, and a list of whom to contact at the Department of Education regarding default rate issues. (DB)

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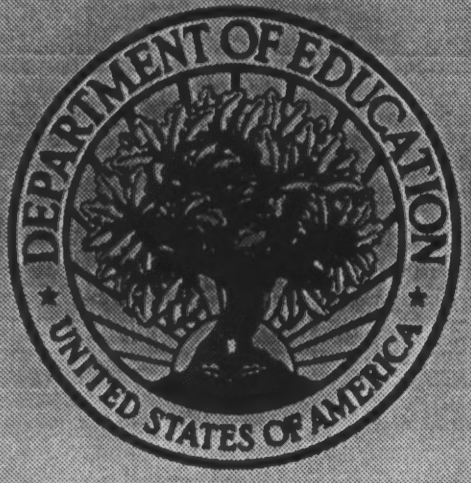
ED 396 656

FY 1993 Cohort Default Rate Data

Pre-Publication Review Booklet



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Introduction

The Higher Education Technical Amendments of 1993 (hereafter, Technical Amendments of 1993) contain a provision to allow all schools an opportunity to review and correct errors in the cohort default rate data the guaranty agencies provide to the U.S. Department of Education (Department) prior to the calculation of official cohort default rates.[1]

The Technical Amendments of 1993 specify that the guaranty agencies will afford schools the opportunity to review the data. To facilitate and simplify the process for all concerned, the Department has decided to provide schools with the cohort default rate data through the new National Student Loan Data System (NSLDS), which will also calculate FY 1993 official cohort default rates later this year. See 34 C.F.R. § 668.17(h); 59 Fed. Reg. 22278, 22284 (April 29, 1994); 59 Fed. Reg. 61192, 61202 (November 29, 1994).

NSLDS is the first national database of loan-level information on the Title IV aid programs. As a result, NSLDS will benefit schools by providing them with an improved source of Federal Family Education Loan (FFEL) cohort default rate data and easy access to the back-up data for each cohort default rate calculated.

Schools are strongly encouraged to review carefully the FY 1993 cohort default rate data provided to them during this pre-publication review period. While the Department is providing schools with their FY 1993 cohort default rate data, please remember to submit any challenge of the default rate data directly to the guaranty agencies that reported the information to the Department. **Do not submit your challenge to the Department. If you submit your challenge to the Department, it will be returned to you, which could cause your school to miss the deadline for challenging the data.** Please refer to the section entitled "Challenging the Cohort Default Rate Data" for information on how to challenge the data.

This booklet was written by the Default Management Section of the Office of Postsecondary Education to assist you in understanding your school's rights and responsibilities. **Please read this booklet and the regulations referred to carefully.** The booklet includes important information regarding the deadlines and procedures for challenging the data. The booklet also describes the calculation process for schools that want to use the default rate data to calculate their FY 1993 cohort default rates. Please read the section entitled "The Calculation of Cohort Default Rates" for information on how to calculate your school's FY 1993 cohort default rate.

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[1] See Section 435(m)(1)(A) of the Higher Education Act of 1965, as amended (HEA), and 34 C.F.R. § 668.17(h).

The FY 1993 pre-publication cohort default rate data are not considered public information and may not be voluntarily released by the Department or the guaranty agencies to the general public. In addition, there are no immediate consequences associated with the FY 1993 cohort default rate data provided to a school during the pre-publication review period. However, your school will be subject to the applicable consequences, if any, of its official cohort default rate when the Department calculates FY 1993 official cohort default rates later this year. Moreover, your school may not appeal its FY 1993 official cohort default rate based on allegations of erroneous data unless your school alleged the same data errors during the pre-publication review of its FY 1993 cohort default rate data. [2] See 34 C.F.R. § 668.17(h)(7).

While every attempt has been made to ensure that this *FY 1993 Cohort Default Rate Data Pre-Publication Review Booklet* addresses all cohort default rate issues related to this process, changes to applicable rules may occur after printing of this document. To the extent that this booklet is inconsistent with the applicable federal statutes and regulations, the laws and regulations are controlling. Therefore, schools should always consult the latest statutes, regulations, and other official statements of policy and procedures published by the Department as well as this *FY 1993 Cohort Default Rate Data Pre-Publication Review Booklet*. This booklet contains statutory and regulatory references for your convenience.

The consequences associated with FY 1993 official cohort default rate thresholds are summarized on the following page. When the Department issues FY 1993 official cohort default rates in the fall of 1995, schools with cohort default rates of 20.0 percent or greater may submit appeals based on allegations of improper loan servicing and collection, and schools that are subject to loss of Federal Family Education Loan (FFEL) program eligibility may also submit appeals based on exceptional mitigating circumstances. However, schools may not challenge the default rate data on either of these grounds during the pre-publication review of FY 1993 cohort default rate data. See 59 Fed. Reg. at 22280 (April 29, 1994).

[2] The Department will allow schools to challenge official cohort default rate data that are not included in the FY 1993 pre-publication cohort default rate data and allegations of error that are challenged during the pre-publication review process but are not resolved prior to the calculation of FY 1993 official cohort default rates.

Cohort Default Rate Categories and Consequences of FY 1993 Official Cohort Default Rates

0.0 - 20.0% -- Not required to implement any additional default reduction measures. However, the default reduction measures outlined in 34 C.F.R. Part 668, Appendix D, have proven useful in reducing defaults, and the Department recommends that all schools implement these measures.

20.1 - 24.9% -- Required to implement a default management plan.

25.0 - 40.0% -- Subject to a review by a State Postsecondary Review Entity (SPRE)[3], and required to implement a default management plan.

25.0% or Greater for FY 91, FY 92, and FY 93 -- Loss of eligibility to participate in the FFEL programs; eligibility to participate in the William D. Ford Federal Direct Loan (Direct Loan) Program will be affected by the loss of FFEL program eligibility; subject to a SPRE review[3]; default management plan required.

40.1% or Greater -- Possible Limitation, Suspension, or Termination action affecting participation in all Title IV student assistance programs.

[3] If your school is notified that it is subject to a SPRE review based on its FY 1993 official cohort default rate, it can only challenge that rate on the grounds of erroneous data if there are alleged data errors that are challenged but are not resolved during the pre-publication review period, or the FY 1993 official cohort default rate data contains new data that were not provided to your school during this pre-publication review period. Therefore, please consider this factor when deciding whether to challenge the accuracy of the FY 1993 cohort default rate data provided to your school during the pre-publication review period.

The Calculation of Cohort Default Rates

This section describes the reporting and calculation procedures used to calculate cohort default rates. The section entitled "Back-Up Data" also contains information on reporting requirements and procedures. Instructions on how to use the cohort default rate information to calculate your school's FY 1993 cohort default rate are provided at the end of this section.

How Student Loan Activity Is Tracked and Reported

The FY 1993 cohort default rate data were electronically reported to NSLDS by the guaranty agencies on the basis of each school's Office of Postsecondary Education Identification Number (OPE-ID), also referred to as the School Identification Number (SID). This number identifies each free-standing or separate institution and is entered by the school on every FFEL loan application. The SID provides guaranty agencies with a means of reporting individual loan activity on a school-by-school basis. The FY 1993 cohort default rate data were reported by the guaranty agencies according to the reporting procedures developed by the Department and reflect activity on loans through September 30, 1994.

Loans that were transferred from one guaranty agency to another were reported to the Department by the current guarantor of those loans. For example, if a loan was originally guaranteed by the Higher Education Assistance Foundation (HEAF) and was transferred to the Great Lakes Higher Education Corporation (Great Lakes), that loan was reported by Great Lakes.

Due to recent closures of several guaranty agencies, such as the Puerto Rico Higher Education Assistance Corporation and the Mississippi Guaranty Student Loan Agency, loans that were formerly guaranteed by those agencies have been transferred to other guaranty agencies. The current guarantor of loans formerly held by a guaranty agency that has closed can be identified by the three-digit guaranty agency code listed on schools' back-up data. A list containing the names, addresses, and the guaranty agency codes used by the Department to identify each guaranty agency is included at the end of this booklet. The contact for information on loans held by the Department is also discussed in that section.

What Student Loans Are Included in the Calculation

Subsidized Federal Stafford, Unsubsidized Federal Stafford, and Federal Supplemental Loans for Students (Federal SLS) loans that qualified for reinsurance are included in the cohort default rate calculation. Lender-of-Last-Resort loans (i.e., Federal Stafford loans made to borrowers by a designated lender-of-last-resort) are also included. If a student defaults on a Federal Consolidation Loan that paid off one of these loans during the appropriate fiscal year, the loans that were paid off as a result of the consolidation are counted as in default in the calculation. See Section 435(m) of the HEA. Federal PLUS Loans and Federal Insured Student Loans are not used in the calculation. **However, the FY 1993 cohort default rate data will include information on Federal PLUS Loans, even though these Federal PLUS Loans are not used in the calculation.**

For the purpose of calculating cohort default rates, the Department counts only those Subsidized Federal Stafford, Unsubsidized Federal Stafford, and Federal SLS loans that enter repayment in a particular fiscal year. If any of those loans default before the end of the fiscal year immediately following the fiscal year the loans entered repayment, those loans are considered in default. This reporting period is referred to as a **cohort period.**[4]

For example, for the FY 1993 cohort period, the Department counts only those Subsidized Federal Stafford, Unsubsidized Federal Stafford, and Federal SLS loans that entered repayment in FY 1993 (anytime from October 1, 1992 through September 30, 1993). Any of those loans that defaulted during the period from the beginning of FY 1993 to the end of FY 1994 (from October 1, 1992 through September 30, 1994) are considered in default for purposes of the cohort default rate calculation. If a student entered repayment in FY 1993 and defaulted after September 30, 1994, the loan is counted as entering repayment in FY 1993, but it is not counted as a default in any fiscal year's cohort default rate calculation because the loan defaulted outside the cohort period in which it entered repayment.

The number of students who enter repayment in each cohort period is determined by counting the number of different social security numbers in that category. If a student has more than one loan reported for that particular fiscal year (for example, two Federal Stafford loans or one Federal Stafford and one Federal SLS loan), the student is counted only once. However, if a student borrowed to attend more than one school, then the student is counted in the calculation for each school. Also, if a student has more than one loan and each loan enters repayment in different fiscal years, the student's loans are counted in each applicable fiscal year.

[4] The FY 1987 to FY 1993 cohort periods are listed at the end of this section.

How a Loan's Status Affects the Calculation

The following information is provided to answer the most frequently asked questions about how a loan's status, or changes in that status, affect the calculation of cohort default rates.

- The date a Subsidized Federal Stafford or Unsubsidized Federal Stafford loan enters repayment determines the fiscal year in which the loan is included in the calculation. The repayment period for a Subsidized Federal Stafford or Unsubsidized Federal Stafford loan does not start until the borrower has received the complete six-month grace period to which he or she is entitled. Therefore, a student who graduates from one school and transfers to another school before the expiration of his/her six-month grace period does not enter repayment until the student receives a complete, uninterrupted six-month grace period. (Please read the section entitled "Back-Up Data" for the definitions used to determine the date entered repayment for Federal Stafford and Federal SLS loans.)

- Loans that were paid off as a result of consolidation during FY 1993 are counted in the calculation as paid through consolidation. Please note that Section 435(m) of the HEA now requires the Department to track defaults on Federal Consolidation Loans. As a result, if a student defaults on a Federal Consolidation Loan during the cohort period in which the underlying consolidated loans entered repayment, the underlying loans that were consolidated are counted as in default in the calculation.

- Loans that were discharged due to death, permanent disability, or bankruptcy are not counted as defaulted loans in calculating the FY 1993 cohort default rate if the guaranty agency was notified of the death, disability, or bankruptcy before the default. These loans are counted as having entered repayment.

- If a student entered repayment in FY 1993, defaulted on that loan during FY 1993 or FY 1994 and a default claim was paid, the loan is counted as in default for the FY 1993 cohort default rate calculation, even if the student later entered into a repayment arrangement with the guaranty agency, or repaid his or her loan in full.

- If a student entered repayment in FY 1993 and then defaulted on that loan during FY 1993 or FY 1994, the loan is not considered in default for the purpose of calculating FY 1993 cohort default rates if the loan was rehabilitated before the end of FY 1994; it is rare, however, for a student to enter repayment on a loan, default on that loan, and then make 12 consecutive monthly payments to rehabilitate the loan all within the same cohort period (i.e., from October 1, 1992 through September 30, 1994). Please note that the consolidation of a defaulted loan does not constitute rehabilitation of that loan. A defaulted loan may be consolidated if the student makes six (6) consecutive payments, but that loan is still in default.

- If a student pays his or her loan in full prior to the scheduled repayment begin date, or if he/she begins making payments prior to the scheduled repayment begin date, the date the loan was paid-in-full or the date the first payment was made (if prior to the scheduled repayment begin date) is the date that loan entered repayment.

- Warning: A loan is considered in default if a payment is made by an institution, its owner, agent, contractor, employee, or any other entity or individual affiliated with the institution, in order to avoid a default by the borrower. See Section 435(m)(2)(B) of the HEA. A payment made by any of these individuals or entities is considered a payment made to avoid the consequences of the cohort default rate.

Please read the discussion that follows regarding how cohort default rates are, or may be, affected by a school's change in status.

Treatment of Cohort Default Rates for Schools that Change Status

Rules governing the application of cohort default rates to schools that change status through branching, consolidation, change of ownership, or other means are prescribed by 34 C.F.R. § 668.17(e)(iii) and (iv). Examples of status changes that affect the calculation of both draft and official cohort default rates are described below.

Location of One School to a Free-standing School

When a school that was formerly a location of a free-standing school changes its status to become an independent free-standing school, the cohort default rates from the former parent school will be applied to the newly independent free-standing school based on school's status as of October 1 of the fiscal year for which a cohort default rate is being calculated.

Free-standing to Separate Location of Another School

When a school that was free-standing becomes a location (branch) of another school, the Department will add the repayment and default data of the former free-standing school to the repayment and default data for the new parent school and calculate a cohort default rate on that basis for the parent school and all of its locations.

Location to Location

If a school changes its status from a location (branch) of one school to a location (branch) of another school, the Department will combine the repayment and default data for the former parent of the location to the repayment and default data for the parent school acquiring the location and will calculate a default rate for the new parent school and all of its locations.

Merger of Free-standing Schools

When two or more free-standing schools merge, the repayment and default data for all schools are combined to calculate a cohort default rate for the new school.

Note: The Department will add the repayment and default data based on the cohort year in effect at the time that the Department recognizes the change in status until the first day of the cohort year in which the change actually took place. For example, if a school undergoes a location to location change on November 30, 1994, the school's FY 1992 cohort default rate is considered in effect and, thus, is affected because the location change occurred after the official cohort default rate for FY 1992 had been issued but before the FY 1993 official cohort default rate was issued. Therefore, the FY 1992 cohort default rate is in effect and the Department will revise the school's FY 1992 rate accordingly. The adding of repayment and default data will continue for the calculation of the FY 1993, FY 1994, and FY 1995 cohort default rates because the school was a branch of its former school on October 1, 1992, October 1, 1993, and October 1, 1994, the first day of each fiscal year. When the FY 1996 rates are calculated, the school's default rate will not include the merged data since it was not a part of the former parent on October 1, 1995, the first day of FY 1996.

If your school is subject to the cohort default rate of another school, your school can calculate its FY 1993 cohort default rate with the FY 1993 cohort default rate data. Please read the instructions that follow for further information on how to calculate your school's FY 1993 cohort default rate.

How To Use the Back-Up Data To Calculate Your School's Cohort Default Rate

Schools may use the cohort default rate data ("back-up data") to calculate their FY 1993 draft cohort default rates. However, schools with fewer than 30 borrowers entering repayment in FY 1993 should note that the FY 1993 cohort default rate data may not reflect all of the information that may be included in their FY 1993 official cohort default rates because their official default rates may be based on an average of the data for the three most recent fiscal years. For further information on the calculation of **average** cohort default rates, please read the discussion that follows on page 13.

The Department uses the following formula to calculate a cohort default rate:

$$\frac{\text{\# of students who entered repayment in FY 1993 and defaulted on or before the end of FY 1994 (Numerator)}}{\text{\# of students who entered repayment in FY 1993 (Denominator)}} \times 100$$

Example:

A school has 100 students entering repayment in FY 1993 (October 1, 1992 through September 30, 1993). Of those 100 students, 25 defaulted on their student loans prior to October 1, 1994 and had a default claim paid by the guaranty agency. This school's FY 1993 cohort default rate is calculated by dividing 25 by 100 and multiplying the result by 100 to produce a cohort default rate of 25.0 percent.

Schools may determine how the loan records are used in the calculation by looking at the last item in the right hand column of each loan record in the back-up data. The "Usage" field tells you how the specific loan record was used in your school's cohort default rate calculation. A "B" in this field means that the loan was counted as in repayment and in default (i.e., it was included in the denominator and numerator). A "D" means that the loan was counted as in repayment (i.e., it was included in the denominator) only. An "N" means that the loan was not used in the calculation of your school's cohort default rate. An "E" indicates that the Department did not count that particular loan in the calculation because the student had another loan listed that was already counted in the calculation. **Remember:** The Department only counts a borrower once in the calculation.

The total numerator and denominator counts are listed on the last page of the back-up data. Therefore, if you want to calculate your school's FY 1993 draft cohort default rate, you need only look at the last page of your school's back-up data for the total numerator and denominator counts. Divide the total numerator count by the total denominator count and multiply this number by 100 to determine your school's FY 1993 draft cohort default rate.

Average Cohort Default Rates

Schools that had fewer than 30 borrowers entering repayment in FY 1993, and had data reported by guaranty agencies in both of the two preceding fiscal years, may use the FY 1991 and FY 1992 back-up data they received previously with the FY 1993 data to calculate the average of the data for the three most recent fiscal years.

The formula to calculate an **average** cohort default rate is:

$$\frac{\text{\# of students who entered repayment in FY 1991, FY 1992, and FY 1993 and defaulted before the end of the fiscal year immediately following the fiscal year they entered repayment (Numerator)}}{\text{\# of students who entered repayment in FY 1991, FY 1992, and FY 1993 (Denominator)}} \times 100$$

Please note: If your school has had either its FY 1991 and/or FY 1992 default rate revised due to a recalculation of a default rate or substituted due to a change in the school's status, the revised or substituted data should be used to calculate an average default rate for your school.

Cohort Periods by Fiscal Years

FY 1987	**Defaulted (numerator)**	**10-1-86 to 9-30-88**
	Enter Repay (denominator)	**10-1-86 to 9-30-87**
FY 1988	**Defaulted (numerator)**	**10-1-87 to 9-30-89**
	Enter Repay (denominator)	**10-1-87 to 9-30-88**
FY 1989	**Defaulted (numerator)**	**10-1-88 to 9-30-90**
	Enter Repay (denominator)	**10-1-88 to 9-30-89**
FY 1990	**Defaulted (numerator)**	**10-1-89 to 9-30-91**
	Enter Repay (denominator)	**10-1-89 to 9-30-90**
FY 1991	**Defaulted (numerator)**	**10-1-90 to 9-30-92**
	Enter Repay (denominator)	**10-1-90 to 9-30-91**
FY 1992	**Defaulted (numerator)**	**10-1-91 to 9-30-93**
	Enter Repay (denominator)	**10-1-91 to 9-30-92**
FY 1993	**Defaulted (numerator)**	**10-1-92 to 9-30-94**
	Enter Repay (denominator)	**10-1-92 to 9-30-93**

----------Default Rate Thresholds for Loss of FFEL Program Eligibility----------

FY 1987, FY 1988, FY 1989 = 35% or greater
FY 1988, FY 1989, FY 1990 = 35% or greater
FY 1989, FY 1990, FY 1991 = 30% or greater
FY 1990, FY 1991, FY 1992 = 25% or greater
FY 1991, FY 1992, FY 1993 = 25% or greater

Challenging the Cohort Default Rate Data

The Technical Amendments of 1993 amended Section 435(m) of the HEA to allow all schools an opportunity to review and correct errors in the cohort default rate data before the calculation of official cohort default rates. The law applies to cohort default rates calculated on or after October 1, 1994. The regulations governing the procedures for challenging the cohort default rate data were published in the *Federal Register* on April 29, 1994 and November 29, 1994. See 34 C.F.R. § 668.17 (h). Please be advised that 34 C.F.R. § 668.17 (h)(7) of the regulations specifies that schools may not appeal an official cohort default rate on the grounds of erroneous data unless the errors were challenged by those schools during the pre-publication review period. [5]

The Department's Role

The Department provides all schools with their cohort default rate data. However, any allegations of error must be submitted directly to the guaranty agencies that reported the information to the Department. **Do not submit your allegations of error to the Department. If you submit your school's challenge to the Department, it will be returned to your school, and your school may miss the deadline for challenging the data.** The guaranty agencies are required to submit copies of the final responses they send to schools to the Department.

The information used to calculate cohort default rates will be changed to reflect allegations of error made by an institution, confirmed by the guaranty agency, and accepted by the Department prior to releasing final cohort default rates. The guaranty agency should make the appropriate changes in the default rate information to NSLDS once the guaranty agency has determined that it agrees with a school's allegation of error. The Department will review the guaranty agency's changes.

Deadline for Challenging the Cohort Default Rate Data

All schools have 30 calendar days from the receipt of their FY 1993 cohort default rate data (commonly referred to as "back-up data") to notify the appropriate guaranty agency(ies) of any information in the default rate data that they believe is incorrect and provide evidence to support their allegations.

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[5] A school may challenge its FY 1993 official cohort default rate on the grounds of erroneous data if its FY 1993 official cohort default rate is calculated with default rate data that are not provided during the pre-publication review period OR the school challenges the data during the pre-publication review period, but the allegations of error are not resolved prior to the calculation of the school's FY 1993 official cohort default rate.

The Pre-Publication Review Process

1 . **Review the Back-up Data**--Your school has 30 calendar days from the date it receives the back-up data to identify and notify the guaranty agencies of any information that it believes to be incorrect, and provide evidence to support each allegation of error. Therefore, you should review the data immediately upon receipt to identify any discrepancies with your school's records. Please consult the section on back-up data for information on how to read the back-up data. Please make sure your school reviews the Federal SLS repay date field. In the past, under the tape dump procedures for calculating cohort default rates, the Federal SLS repay date was computed by the Department using other data elements submitted by the guaranty agencies (e.g., enrollment status and end class date, etc.) For FY 1993, the guaranty agencies were instructed to populate the Federal SLS repay date field. In some cases, guaranty agencies may have reported the date of disbursement as the repay date for some Federal SLS loans. While the date of disbursement is the actual date Federal SLS loans enter repayment, it is not the repay date for the purpose of calculating cohort default rates. Please review the definition used to determine the date entered repayment for Federal SLS loans for the purpose of calculating cohort default rates on page 29. If you find such an error in your school's data, please notify the guaranty agency that reported the information to the Department.

2. **Contact the Guaranty Agency**--If you discover discrepancies between the information in your school's records and the back-up data used to calculate your school's draft cohort default rate, you must provide the guaranty agency(ies) with evidence[6] to support your school's contention that the default rate data are incorrect and should be changed. Before preparing and mailing your school's challenge to the guaranty agency that reported the data to the Department, please make sure that you have included all of the items listed on the following page.

[6] Evidence of error may include documentation such as a signed and dated copy of a Student Status Confirmation Report showing that the student's last date of attendance was correctly reported to the guaranty agency in a timely manner, but that a different last date of attendance was used to determine the date entered repayment, and/or a copy of the front and back of a cancelled check showing that the student's loan was cancelled in full within 120 days of disbursement by the lender. Of course, the type of evidence required will depend on the type of error claimed.

3. **Guaranty Agency(ies) Response**--Within 30 calendar days of receiving your school's challenge, the guaranty agency(ies) must respond to your school's challenge. The guaranty agency(ies) response(s) must be mailed to both the school and the Department. Each guaranty agency's response must contain the following information: 1) a response to each allegation of error made by the school and any evidence to support its position, and 2) any errors in the data previously submitted to the Department that the agency believes it has identified. **Please note that it is <u>unacceptable</u> for the guaranty agency(ies) to group allegations of error by type and simply state that all loans were reported to the Department correctly or incorrectly.**

<u>Checklist for Submission of a Challenge to a Guaranty Agency</u>

At a minimum, your school's challenge should include:

- A list of all disputed accounts. Please list borrowers in social security number order. The list must include the borrower's name, social security number, and the nature of each alleged error.

- Evidence to support each allegation of error.

- Copies of all relevant pages from the back-up data. Each allegation must be accompanied by at least one (1) page of back-up data. For example, if a student has a Federal Stafford loan that has been erroneously included in or excluded from the school's FY 1993 cohort default rate data, the school must provide the page from the back-up data where the student's social security number appears, or would have appeared if it were listed. If your school's challenge to the FY 1993 data will affect a prior fiscal year's calculation, you should include two (2) pages of back-up data with your challenge: the page from the FY 1993 back-up data where the student's social security number appears, or would have appeared if he/she were listed, and the page from the other fiscal year's back-up data, if available, (e.g., a page from FY 1992 or FY 1991 back-up data) where the student is or should be listed. If your school does not have the page from the prior year's back-up data to support its allegation of error, it should inform the guaranty agency. If the error cannot be resolved by the guaranty agency without the prior year's back-up data, that error can be addressed in the official appeal process.

Schools are strongly encouraged to read the section on back-up data for important information on the use of back-up data in cohort default rate data challenges before they submit their challenges to the guaranty agencies.

Reasons an Agency May Refuse To Accept a School's Claim of Error

A guaranty agency may refuse to accept a school's claim of error if the school makes only general allegations, or incorrect allegations, regarding the accuracy of the cohort default rate data, such as:

- The school failed to notify, or failed to notify timely, the lender or the guaranty agency of the student's change in status, which resulted in the student being listed in the wrong cohort year, or with the wrong loan status. Because the guaranty agency relied on the best available data, and the school failed to satisfy its legal responsibility to notify the lender or the guaranty agency of the correct information on a timely basis, the guaranty agency's records for that student may be revised, but it will not result in a change in the school's cohort default rate.

- The school's refund on a loan that was cancelled was not made within 120 days of the disbursement of the check by the lender. In this case, the origination fee and insurance premium paid by the student are not refundable. If the refund only covers the principal borrowed by the student, the fees remain as an outstanding debt and may constitute a default if not paid.

- School fails to provide supporting documentation for each allegation of error.

- School does not submit allegations and evidence within the regulatory timeframes.

Changes to Cohort Default Rate Data

The cohort default rate data will be changed to reflect allegations of errors that were identified by the schools, confirmed by the guaranty agencies, and accepted by the Department. The cohort default rate data will then be used by the Department to calculate FY 1993 official cohort default rates for schools. If for some reason a guaranty agency has not responded to a school's allegations of error by the time the Department calculates FY 1993 official cohort default rates, the school may submit those allegations of error to the Department after the release of the FY 1993 official cohort default rates. Once the guaranty agency determines that it agrees with a school's claim of error, it should make the appropriate default rate data changes to NSLDS. The Department will review the guaranty agency's changes.

Back-Up Data

The back-up data (Loan Detail Report) contains the loan records of FFEL program borrowers who attended your school and were reported to the Department by the guaranty agencies for the purpose of calculating your school's cohort default rate. If your school is subject to another school's default rate due to a change in the school's status, the information will cover loans guaranteed for students who attended all schools from which your cohort default rate will be calculated.

How To Use the Back-Up Data

The back-up data should be reviewed by schools to ensure that the data are correct. If errors are found, the back-up data can then be used by schools to challenge the accuracy of the cohort default rate data reported by the guaranty agencies.

When a school challenges the data, it should send the page of the back-up data where the student appears, or should have appeared, so the guaranty agency (and the Department, in the case of an appeal of an official cohort default rate) can see where the student's loan was included or excluded, as the case may be, from the calculation.

PLEASE REMEMBER: If a student's social security number appears, or should appear, at the top or bottom of a back-up data page, please send the guaranty agency the preceding or following page, so the agency can verify that the student had no other loans reported in that cohort period.

In many cases, a school will have to send several pages of back-up data for each allegation of error because a change to the data used to calculate one year's cohort default rate will result in a change to a prior year's cohort default rate. For example, a guaranty agency may report a loan as entering repayment in the FY 1993 cohort period based on the anticipated graduation date on the student's loan application. However, the school's records reveal that the loan should have been converted into repayment status during the FY 1992 cohort period based on the student's actual last date of attendance at the school. The school timely notified the guaranty agency of the change in the student's last date of attendance. The guaranty agency agrees with the school that the date entered repayment for this loan places the loan in the FY 1992 cohort period, not the FY 1993 cohort period. Before a change can be made to the school's FY 1993 and FY 1992 cohort default data and rates, the guaranty agency must verify that the loan was, in fact, included in the wrong cohort year.

The guaranty agency would then review the page from the FY 1993 back-up data where the student's social security number appears and the page from the school's FY 1992 back-up data where the student's social security number should have appeared, and notes that the student was incorrectly included in the FY 1993 cohort default rate data and excluded from the FY 1992 cohort default rate data. The guaranty agency will correct the data error.

What's New for FY 1993

Back-up data is now produced by NSLDS based on information that the guaranty agencies reported to NSLDS for the purpose of calculating cohort default rates.

As a result, you may notice that the back-up data your school receives will appear different in terms of content and general appearance from the back-up data that you may have received in prior years. These changes will make it easier for you to read and understand how the loan information is used.

Claim Paid Date

The new back-up data will reflect the type of loan; the claim paid date; and, if a claim was paid on the loan, the reason a claim was paid. The Department, for operational purposes, uses the claim paid date to determine if a loan will be placed in the numerator, which can only be to the school's advantage. However, the use of the claim paid date does not preclude the Department from using the actual default date if that date is available. The total number of borrowers included in the numerator and denominator of the school's cohort default rate data is also listed on the last page of the back-up data report.

In prior years, schools had to send at least two (2), and often as many as four (4), pages of back-up data for each allegation in their cohort default rate challenges because the back-up data consisted of two separate reports--the Federal Stafford back-up data and the Federal SLS back-up data.

Beginning with the release of the FY 1993 cohort default rate data, the back-up data is no longer split into two (2) reports: all Subsidized Federal Stafford, Unsubsidized Federal Stafford, and Federal SLS loans are listed together on the back-up data report for each cohort year. As a result, if your school is submitting pages from the back-up data it receives for FY 1993, it will only have to send one (1) page, or at most two (2) pages of back-up data (if more than one cohort year will need to be corrected) for each allegation of error.

For example, a school will only have to send the page from the FY 1993 back-up data if the school alleges that a student was erroneously excluded from the FY 1993 default rate data. The student was not previously included in another cohort period, as was the case in the earlier example, so the school only needs to show that the student was not included in the FY 1993 data by sending the page from the back-up data where the student's social security number should have appeared.

Please read the following information if your school will be submitting pages from the FY 1993 back-up data and back-up data it received in prior years.

How To Use PRE-NSLDS and NSLDS Back-Up Data

For ease of reference, back-up data that your school received prior to the pre-publication review of the FY 1993 cohort default rate data will hereafter be referred to as PRE-NSLDS back-up data, and back-up data that your school receives beginning with the FY 1993 cohort default rate data pre-publication review will be referred to as NSLDS back-up data.

All Subsidized Federal Stafford, Unsubsidized Federal Stafford, and Federal SLS loans are listed together on any back-up data processed by NSLDS. As a result, if your school's challenge to the FY 1993 data does not affect data reported in prior cohort periods, then only one (1) page of back-up data is required for each account challenged.

On the other hand, if your school's challenge involves a change to a prior year's data, your school can use any PRE-NSLDS back-up data it received for FY 1992, FY 1991, or other prior years, to support its allegations of error. The only difference is, your school must submit additional pages of back-up data for each allegation of error cited in your school's challenge because two (2) pages of PRE-NSLDS back-up data (both the Federal Stafford and SLS portions) will be required for each allegation of error.

For example, suppose your school alleges that a loan was reported in the wrong cohort period (e.g., the loan was included in the FY 1993 cohort period, but belongs in the FY 1992 cohort period), it should submit three (3) pages of back-up data: one (1) page from the FY 1993 NSLDS back-up data to show that the student was incorrectly included in the FY 1993 calculation and two (2) pages of PRE-NSLDS FY 1992 back-up data--one page from the Federal Stafford and one page from the Federal SLS back-up data--to verify that the loan was erroneously excluded from the FY 1992 calculation.

Reminder: If a student's social security number appears, or should appear, at the top or bottom of a back-up data page, please send the guaranty agency the preceding or following page, so the agency can verify that the student had no other loans reported in that cohort period.

If your school has any questions about which, or how many, pages of NSLDS and/or PRE-NSLDS back-up data to send to the guaranty agency, please call the Default Management Section's Hotline at (202) 708-9396.

How To Read Back-Up Data Printouts

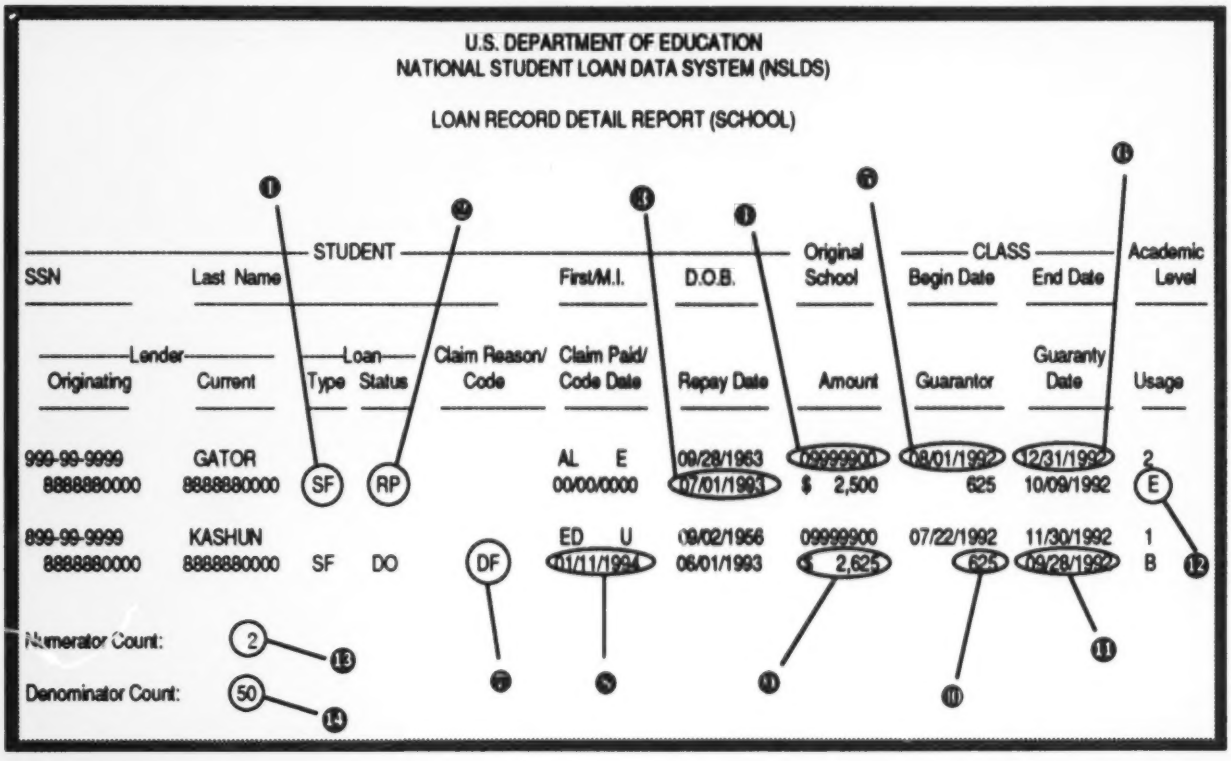
A back-up data printout, called a "Loan Record Detail Report," is an extract of the loan records that forms the basis for calculating your school's cohort default rate.

At the top of the first page of the printout you will find general information, including the name of the school, the school's OPE-ID, the cohort year covered, and the process date. The process date is the date that the Department printed the report; it is not the date the Department receives or uses the data to determine your school's cohort default rate.

The back-up data is sorted by borrower social security number. The data field descriptions for the back-up data can be found on the first two lines at the top of each page of back-up data--one right below the other. To locate specific loan information for a particular borrower, make sure you read the line of the loan record that corresponds with the data field description line. For example, to find a student's "Repay Date," the data field description for that data element shows that it can be found on line two (2) of the student's loan record. Therefore, look on the second line of the loan record for the "Repay Date." The date listed above the "Repay Date" in the loan record is the borrower's date of birth (DOB).

The following page contains a sample page of back-up data, annotated with the major elements in each loan record.[7]

[7] **The back-up data will include information on Federal PLUS Loans, even though Federal PLUS loans are not used in the calculation. A Federal PLUS Loan is identified with a "PL" loan type code and an "N" in the usage field, which means that the loan is not counted in the calculation.**



❶ **Loan Type:** The following codes indicate the type of loan:

- **CL** Federal Consolidation Loan
- **SF** Subsidized Federal Stafford Loan
- **SL** Federal SLS (Supplemental Loans for Students)
- **SU** Unsubsidized Stafford Loans

❷ **Loan Status:** Current status of borrower's loan. The loan status codes are listed on pages 27 and 28.

❸ **Repay Date:** The date used to determine if the loan is included in the denominator of the calculation. See page 29 for the definitions used to determine the date entered repayment.

❹ **Original School:** The OPE-ID of the school the borrower was attending when the loan was made.

❺ **Class Begin Date:** The date classes were scheduled to start for the loan period covered by the loan.

❻ **Class End Date:** The date classes were scheduled to end for the loan period covered by the loan.

❼ **Claim Reason/Code:** This field will contain a code of "DF" if the loan status field indicates that the borrower defaulted. Otherwise the field is blank.

❽ **Claim Paid/Code Date:** The date used to determine if the loan is included in the numerator of the calculation. See page 22 for further information.

❾ **Amount:** The amount of the loan less any cancelled funds.

❿ **Guarantor:** The three-digit code that identifies the guaranty agency that reported the loan information.

⓫ **Guaranty Date:** The date the guaranty agency insured repayment of the loan to the lender.

⓬ **Usage:** Indicates how data were used in calculation.

- **D** Entered repayment only-denominator only
- **B** Entered repayment and defaulted-both numerator and denominator
- **N** Not used in the calculation
- **E** Not counted because another loan already counted in this cohort calculation

⓭ **Numerator Count:** Derived from the total number of records coded with a "B" in the **Usage** data field.

⓮ **Denominator Count:** Derived from the total number of records coded with a "D" or a "B" in the **Usage** data field.

List of Loan Status Codes

CODE	STATUS
BC	Bankruptcy Claim, Discharged
BK	Bankruptcy Claim, Active
CA	Cancelled
DA	Deferred
DB	Defaulted, Then Bankrupt, Active, Chapter 13
DC	Defaulted, Compromise
DD	Defaulted, Then Died
DE	Death
DI	Disability
DK	Defaulted, Then Bankrupt, Discharged, Chapter 13
DL	Defaulted, In Litigation
DO	Defaulted, Then Bankrupt, Active, Other
DP	Defaulted, Paid-In-Full
DS	Defaulted, Then Disabled
DT	Defaulted, Collection Terminated
DU	Defaulted, Unresolved

Continued on page 28

List of Loan Status Codes

CODE	STATUS
DW	Defaulted, Write-Off
DX	Defaulted, Six Consecutive Payments
FB	Forbearance
ID	In School or Grace Period
OD	Defaulted, Then Bankrupt, Discharged, Other
PC	Paid-In-Full Through Consolidation
PF	Paid-In-Full
RF	Refinanced
RP	In Repayment
UI	Uninsured/Unreinsured

Information Used To Calculate Default Rates

When reviewing your school's back-up data, please keep in mind that the Department calculates default rates by counting unduplicated borrower social security numbers. Therefore, a student may have multiple loans, e.g., a Federal Stafford and a Federal SLS loan, listed in the back-up data because those loans entered repayment in the same cohort period, but the student was only counted once in the cohort default rate calculation. Likewise, if there are multiple loan records for the student for one of the loan programs, the student will still be counted only once. You should note that the data reflects the status of loans through September 30 of the year following the cohort year. Therefore, data for the FY 1993 cohort year reflect the status of loans through September 30, 1994. Changes after that date, including a student's present loan status, have no bearing on your school's cohort default rate calculation.

Definitions Used To Determine the Date Entered Repayment

For the purpose of calculating cohort default rates, the following definitions will determine whether a loan will be included in the denominator of the default rate calculation for a given cohort period.

Subsidized Federal Stafford or Unsubsidized Federal Stafford Loan: enters repayment based on the end of the established grace period plus one day, OR enters repayment based on arrangements made by the student to make payments prior to the end of the grace period plus one day.

Federal SLS Loan: 1) enters repayment based on less than half-time date plus one day; or 2) if the student did not maintain continuous enrollment or has defaulted on the loan AND a date entered repayment has already been established, the date entered repayment will remain the same as the date that was already established; or 3) enters repayment based on the date a Federal Stafford loan enters repayment if the Federal SLS loan meets the criteria established to be linked to a Federal Stafford loan.

For information on the date used to determine whether a loan is included in the numerator of the calculation, please read the discussion about the use of the claim paid - date on page 22.

The criteria for linking a Federal SLS loan's date entered repayment with the date entered repayment for a Subsidized or Unsubsidized Federal Stafford loan are as follows[7]:

The date entered repayment for a Federal SLS loan is the same as a Federal Stafford's date entered repayment if the Federal SLS loan is disbursed after the Federal Stafford loan was made but before the Federal Stafford loan entered repayment, OR if a Federal SLS loan is disbursed prior to a Federal Stafford loan being made and the student maintained continuous enrollment from the date the Federal SLS loan was disbursed to the date the Federal Stafford loan was made.

Privacy Act Notice

Back-up data contains the social security numbers and names of students who borrowed money to attend your school. It contains material of a private nature. The use of this material is covered by the U.S. Privacy Act and also may be governed by state and local laws and regulations. You should take appropriate steps to safeguard this material and to ensure that it is used and disposed of appropriately.

[7] The concept of "linking" the date entered repayment for a student's Federal SLS loan to the same student's Federal Stafford loan is used for the purpose of calculating cohort default rates ONLY.

Contacting the Reporting Guaranty Agency

The guaranty agency list that follows contains the names, addresses, and other identifying information of the guaranty agencies. The agencies are listed in alphabetical order by the name of the state in which it is the primary guarantor. The address and addressee may be used to contact guaranty agencies to resolve discrepancies in backup data. However, do not use this address or addressee if a guaranty agency has provided you with a different address or addressee.

To identify the guarantor that reported specific loan information to the Department, look for the three-digit guaranty agency code listed on the back-up data for each loan record. Then, you can use the three-digit codes listed in parentheses below to identify the guarantor's name and address.

Guaranty Agency List

Alabama, AL (701)

Alabama Commission on Higher Education

ATTN: Assistant Director for Compliance
P.O. Box 2470
Montgomery, AL 36102

Alaska, AK (702)

See United Student Aid Funds, Inc.

Arizona, AZ (804)

See United Student Aid Funds, Inc.

Arkansas, AR (705)

Student Loan Guarantee Foundation of Arkansas
ATTN: Manager, Compliance Division
219 South Victory Street
Little Rock, AR 72201-1884

Assigned to U.S. Department of Education (555)

For FY 1993 and subsequent fiscal years, defaulted loans that have been transferred to the Department due to the closure of a guaranty agency (e.g., HEAF) are/will be identified on schools' back-up data with a 555 guaranty agency code.

If your school requires information on loan(s) identified with a 555 code, please contact:

U. S. Department of Education
Default Management Section
Room 3082, ROB-3
600 Independence Avenue, SW
Washington, DC 20202-5353

California, CA (706)

California Student Aid Commission
ATTN: Manager, Compliance Audits Investigation Unit
P.O. Box 510845
Sacramento, CA 94245-0845

Colorado, CO (708)

Colorado Guaranteed Student Loan Program
ATTN: Manager, Compliance, Training & Investigations
999 18th Street, Suite 425
Denver, CO 80202-2471

Connecticut, CT (709)

Connecticut Student Loan Foundation
ATTN: Manager, Compliance & Lender Relations
525 Brook Street, P. O. Box 1009
Rocky Hill, CT 06067

Delaware, DE (710)

Delaware Higher Education Loan Program
ATTN: Student Loan Specialist
820 North French Street, 4th Floor
Wilmington, DE 19801

Florida, FL (712)

Florida Department of Education
Office of Student Financial Assistance
ATTN: Program Compliance Specialist
1344 Florida Education Center
325 West Gain Street
Tallahassee, FL 32399-0400

Georgia, GA (713)

Georgia Higher Education Assistance Corp.
ATTN: Director of Guaranteed Loans
2082 East Exchange Place, Suite 200
Tucker, GA 30084

Hawaii, HI (815)

See United Student Aid Funds, Inc.

Higher Education Assistance Foundation (HEAF)

For FY 1992 and prior fiscal years' back-up data only, loans that were guaranteed by HEAF will be identified by one of the following guaranty agency codes:
611, 620, 627, 654, 656, and 631

For information on HEAF defaulted loans only, contact:

U.S. Department of Education
Attn: Default Management Section-HEAF
ROB-3, Room 3082
600 Independence Avenue, SW
Washington, DC 20202-5353

Idaho, ID (716)

Student Loan Fund of Idaho, Inc.
76905 Highway 95
P.O. Box 730
Fruitland, ID 83619-0730

Illinois, IL (717)

Illinois Student Assistance Commission
ATTN: Manager, Loan Maintenance
1755 Lake Cook Road
Deerfield, IL 60015

Indiana, IN (718)

State Student Assistance Commission of Indiana
ATTN: Director
150 W. Market Street, Suite 500
Indianapolis, IN 46204

Iowa, IA (719)

Iowa College Student Aid Commission
ATTN: Compliance Officer
201 Jewett Building, Room 201
914 Grand Avenue
Des Moines, IA 50309

Kentucky, KY (721)

Higher Education Assistance Authority
ATTN: Senior Policy Analyst
1050 U.S. 127 South, Suite 102
Frankfort, KY 40601-4323

Louisiana, LA (722)

Louisiana Office of Student Financial Assistance Commission
ATTN: Manager of Policy and Compliance
P. O. Box 91202
Baton Rouge, LA 70821-9202

Maine, ME (723)

Maine Education Assistance Division, Finance Authority of Maine
ATTN: GSL Program and Compliance Coordinator
State House Station 119
Augusta, ME 04333

***Maryland, MD (724)**

*The Maryland Higher Education Loan Corporation has closed. United Student Aid Funds, Inc. will be the guarantor for loans previously held by the Maryland guaranty agency.

For information on loans formerly guaranteed by the Maryland Higher Education Loan Corporation, please contact:

USA Services
Attn: Samantha Garrett-Harden, Default Coordinator
P.O. Box 6180
Indianapolis, IN 46206-6180

***Massachusetts, MA (725)**

American Student Assistance Corporation
ATTN: Director, Lender/School Relations and Compliance
330 Stuart Street
Boston, MA 02116-5292

*Also guarantor for Washington, DC

Michigan, MI (726)

Michigan Higher Education Assistance Authority
Michigan Guaranty Agency
ATTN: Manger, Audit & Program Review
P. O. Box 30047
Lansing, MI 48909

Minnesota, MN (727)

Northstar Guarantee Incorporated
Attn: Student Loan Officer
444 Cedar Street
Piper Jaffary Plaza, Suite 1910
St. Paul, MN 55101-2133

***Mississippi, MS (728)**

*The Mississippi Guarantee Student Loan Agency has closed. United Student Aid Funds, Inc. is now the designated guarantor for Mississippi.

Please submit your challenge to:

USA Services
Attn: Manager, Compliance Operations
P.O. Box 6180
Indianapolis, IN 46206-6180

Missouri, MO (729)

Coordinating Board for Higher Education
ATTN: Senior Associate, Student Financial Aid Programs
3515 Amazonas Drive
Jefferson City, MO 65109-5717

Montana, MT (730)

Guaranteed Student Loan Program
ATTN: Program Coordinator/Compliance
2500 Broadway
Helena, MT 59620-3101

Nebraska, NE (731)

Nebraska Student Loan Program
ATTN: Manager, Compliance and Program Review
1300 O Street, P. O. Box 82507
Lincoln, NE 68501-2507

Nevada, NV (732)

See United Student Aid Funds, Inc.

New Hampshire, NH (733)

New Hampshire Higher Education Assistance Foundation
ATTN: Training and Compliance Director
44 Warren Street, P. O. Box 877
Concord, NH 03302-0877

New Jersey, NJ (734)

New Jersey Higher Education Assistance Authority
Guaranteed Student Loan Program
ATTN: Assistant Director, Management Compliance Unit
4 Quakerbridge Plaza, CN 540
Trenton, NJ 08625

New Mexico, NM (735)

New Mexico Student Loan Guarantee Corporation
ATTN: Compliance & Program Review Officer
3900 Osuna, N.E., P.O. Box 27020
Albuquerque, NM 87125-7020

New York, NY (736)

New York State Higher Education Services Corp.
ATTN: Manager, Program Review Compliance/School
99 Washington Avenue, Twin Towers
Albany, NY 12255

North Carolina, NC (737)

North Carolina State Education Assistance Authority
ATTN: Compliance Review
P. O. Box 2688
Chapel Hill, NC 27515-2688

North Dakota, ND (738)

Student Loans of North Dakota
ATTN: Agency Manager
P. O. Box 5524
Bismarck, ND 58502-5524

Ohio, OH (739)

Ohio Student Loan Commission
ATTN: Manager of Compliance
309 South 4th Street, P.O. Box 16610
Columbus, OH 43216-6610

Oklahoma, OK (740)

Oklahoma Guaranteed Student Loan Program
ATTN: Compliance Coordinator
P. O. Box 3000
Oklahoma City, OK 73101-3000

Oregon, OR (741)

Oregon State Scholarship Commission
ATTN: Loan Processing Division Director
1500 Valley River Drive, Suite 100
Eugene, OR 97401-2146

***Pennsylvania, PA (742)**

Pennsylvania Higher Education Assistance Agency
ATTN: Director, Program Review
1200 N. 7th Street
Harrisburg, PA 17102

* Also designated guarantor for WV

***Puerto Rico, PR (772)**

*The Puerto Rico Higher Education Assistance Corporation has closed.

All loans were transferred to:

Great Lakes Higher Education Corporation
Attn: Compliance and Claims Manager
P.O. Box 7858
Madison, WI 53707

Rhode Island, RI (744)

Rhode Island Higher Education Assistance Authority
ATTN: Chief, Compliance and Collection Division
560 Jefferson Boulevard
Warwick, RI 02886-1320

South Carolina, SC (745)

South Carolina State Education Assistance Authority
ATTN: Manager for Compliance
Interstate Center, Suite 210
P. O. Box 210219
Columbia, SC 29221

South Dakota, SD (746)

Education Assistance Corporation
ATTN: Supervisor for Technical Assistance and Program Reviews
115 First Avenue, S.W.
Aberdeen, SD 57401

Tennessee, TN (747)

Tennessee Student Assistance Corporation
ATTN: Loan Program Administrator
Parkway Towers, Suite 1950
404 James Robertson Parkway
Nashville, TN 37243-0820

Texas, TX (748)

Texas Guaranteed Student Loan Corporation
ATTN: Compliance Manager
Tower Of The Hill
13809 N. Highway 189, Suite 400
Austin, TX 78750-1240

***United Student Aid Funds, Inc. (800)**

USA Services
ATTN: Samantha Garrett-Harden, Default Coordinator
P.O. Box 6180
Indianapolis, IN 46206-6180

*Designated guarantor for AK, AZ, HI, KS, NV, and WY

Utah, UT (749)

Utah Higher Education Assistance Authority
ATTN: Asst. Commissioner for Student Financial Assistance
P. O. Box 45202
Salt Lake City, UT 84145-0202

Vermont, VT (750)

Vermont Student Assistance Corporation
ATTN: Director, ED Loan Guarantee and Default Collection
P. O. Box 2000, Champlain Mill
Winooski, VT 05404-2601

Virgin Islands, VI (778)

Virgin Islands Joint Boards of Education
ATTN: Executive Director, Compliance
P. O. Box 11900
Charlotte Amalia
St. Thomas, VI 00801

Virginia, VA (751)

Virginia Student Assistance Authorities
ATTN: Supervisor, Compliance
411 East Franklin Street, Suite 300
Richmond, VA 23219-2492

Washington, WA (753)

Northwest Education Loan Association
ATTN: Manager, Lender and School Services
500 Colman Building
811 First Avenue
Seattle, WA 98104

West Virginia, WV (654)

See Pennsylvania

Wisconsin, WI (755)

Great Lakes Higher Education Corporation
ATTN: Lender and School Compliance Manager
P.O. Box 7902
Madison, WI 53707

Wyoming, WY (656)

See United Student Aid Funds, Inc.

Whom to Contact Regarding Default Rate Issues

Questions about the pre-publication review of cohort default rate data and general school cohort default rate issues should be directed to the Default Management Section at:

U.S. Department of Education
Room 3082, ROB-3
600 Independence Avenue, SW
Washington, DC 20202-5353
202-708-9396

To resolve errors in your school's back-up data, contact the guaranty agency that reported the data to the Department. A list of guaranty agencies and their addresses is included in the section entitled "Contacting the Reporting Guaranty Agency."

For copies of regulations, Dear Colleague Letters and other student aid publications, contact the Student Aid Information Center at:

U.S. Department of Education
P.O. Box 84
Washington, DC 20044-0084
1-800-433-3243

For individual defaulted loans that have been assigned to the Department of Education for collection, contact the Student Receivables Division, Debt Collection Service at:

U.S. Department of Education
Room 5118, ROB-3
600 Independence Avenue, SW
Washington, DC 20202-5320